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Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

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U.S. Environmental Protection Agency
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Richland, Washington 99352

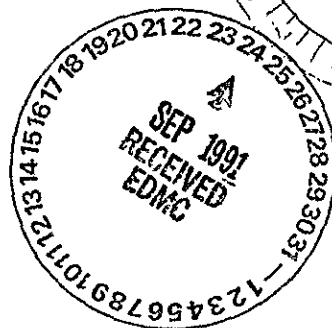
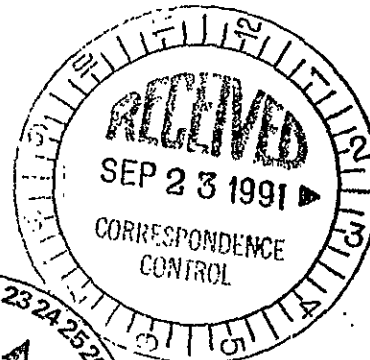
Mr. Timothy L. Nord
Hanford Project Manager
State of Washington
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504-8711

Dear Messrs. Day and Nord:

HANFORD FACILITY DANGEROUS WASTE PERMIT

As you are aware, members of our respective agency staffs have been working over the past several months to develop the documentation required for issuance of the initial Hanford Facility Dangerous Waste Permit. Although considerable progress has been made, we remain concerned that: (1) no formal documentation has yet been received from the regulatory agencies regarding the approach for development of the initial permit and subsequent modifications, and (2) progress toward the resolution of certain key issues has slowed. The purpose of this letter is to discuss the potential impact of these two concerns.

In a letter dated August 28, 1990, the DOE Field Office, Richland (RL) requested that a formalized, mutually agreed upon plan for the issuance of the Hanford Facility Dangerous Waste Permit be developed by RL, the State of Washington Department of Ecology (Ecology), and the U.S. Environmental Protection Agency (EPA). No formal response to this letter has been received, nor has the approach and schedule for the Hanford Facility Dangerous Waste Permit been mutually agreed upon by the parties. We are concerned that the lack of a mutually agreed upon, documented Hanford Facility permitting approach has slowed progress in resolving the outstanding permitting issues. It could also hamper the issuance of the initial Hanford Facility Permit and affect subsequent modifications of that permit. These modifications will involve not only the inclusion of additional unit chapters, but also modifications to the existing portions of the permit. For example, in order to support the current Hanford Waste Vittrification Plant (HWVP) construction schedule, the first modification of the Hanford Facility Permit must be finalized by November 1992, only 7 months after the initial issuance of the Hanford Facility Permit. We are concerned that without careful, well documented planning, and mutual commitments to implement that planning, this aggressive schedule may not be achievable. This is particularly the case if other complex TSD units are planned to be included in that time frame.



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Messrs. Day and Nord

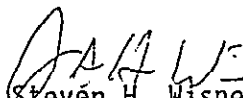
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With regard to Hanford Facility permitting issues, it was the hope of RL that, through the bi-weekly issue resolution meetings initiated in February 1991, many of these issues could have been resolved by now. Unfortunately, the issue resolution meeting approach has met with only limited success. The issues have been difficult and have taken more time to address than originally estimated. Also, several key meetings were canceled or delayed due to the unavailability of Ecology personnel. Additionally, difficult issues were often deferred because an internal agency position had not yet been formulated by Ecology.

To expedite resolution of such issues, project manager involvement was initiated through the meeting held on July 26, 1991. A plan of action to address outstanding issues was set forth at this meeting. As part of this plan, RL requested an opportunity to provide suggested revisions to drafts of the Hanford Facility Dangerous Permit dated June 18, 1991, and July 23, 1991. We proceeded in preparing such revisions and transmitted them to Ecology and EPA on August 6, 1991. It was our understanding that Ecology would consider our suggested changes in their next revision of the draft permit to have been completed by August 9, 1991. In addition, it was our understanding that we would be forwarded a copy of this draft by mid-August 1991, and that we would have an opportunity to discuss its contents with Ecology and EPA prior to and during the meeting which was to have been held on September 12, 1991. That meeting was cancelled by Ecology on September 11, 1991. As of yet, we have not received this draft. We urge that an opportunity to review and discuss the latest draft of the Hanford Facility Permit be arranged as expeditiously as possible so that efforts to resolve outstanding issues can continue.

I look forward to discussing the Hanford Facility permitting process with you further. I am requesting that the two concerns discussed in this letter become agenda items at the next Hanford Facility permitting meeting. If you have any questions, please feel free to call me on (509) 376-6798 or Mr. C. E. Clark of the Environmental Restoration Division on (509) 376-9333.

Sincerely,


Steven H. Wisness
Hanford Project Manager

ERD:CEC

cc: T. D. Chikalla, PNL
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Incoming: 9104226

Subject: HANFORD FACILITY DANGEROUS WASTE PERMIT

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